

RECEIVED
JAN 19 2016
SC Court of Appeals

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)
)
NATIONSTAR MORTGAGE, LLC,)
)
Appellee,)
)
vs.)
)
BARBARA A. GIBBS, MELVIN E.)
GIBBS, And WESTBROOK PHASE IV)
HOMEOWNERS' ASSOCIATION)
)
Appellants.)
_____)

IN THE COURT OF APPEALS
OF SOUTH CAROLINA

CASE NO: 2015-001873

MOTION FOR RECONSIDERATION

I. PRELIMINARY STATEMENT

Appellants received the Court's dismissal of their appeal on the 12th day of January 2016. Appellant file this Motion for Reconsideration this 13th day of January 2016. Having been forced to move from the State of South Carolina does cause damages that must be mitigated.

II. STATEMENT OF FACTS

This Court asked Appellants to answer a single question: "Explain why this [C]ourt has jurisdiction." Appellants provided the South Carolina Supreme Court's statement as to why jurisdiction is MANDATED:

**THE STATE OF SOUTH CAROLINA
In The Supreme Court**

JUSTICE BURNETT: We granted a writ of certiorari to review the Court of Appeals' opinion in Hagood v. Sommerville, S.C. Ct. App. Order dated May 22, 2003 (unpublished order). We reverse....

In a well-established exception to the general rule, we repeatedly have held that the denial of a party's right to a particular mode of trial is immediately appealable as a substantial right under Section 14-3-330(2). See Flagstar Corp. v. Royal Surplus Lines, 341 S.C. 68, 72, 533 S.E.2d 331, 333 (2000) ("Pursuant to § 14-3-330(2), this Court has held on

numerous occasions that when a trial court's order deprives a party of a mode of trial to which it is entitled as a matter of right, such order is immediately appealable.") (listing cases); Creed v. Stokes, 285 S.C. 542, 331 S.E.2d 351 (1985) (order referring case to master in equity affects the mode of trial, a substantial right, and party waived his objection to the reference and his right to jury trial by failing to immediately appeal the order); Bateman v. Rouse, 358 S.C. 667, 675, 596 S.E.2d 386, 390 (Ct. App. 2004) (purpose of immediate appeal on right to particular mode of trial is to preserve party's constitutional right to trial by jury which would otherwise be lost.)

III. STATEMENT OF THE CASE

This case represents the illegal persecution and prosecution of Gibbs. The deliberate illegal acts committed when Appellee does not have STANDING, cannot be tolerated in a civilized society!

MEMORANDUM OF LAW

V. ARGUMENT

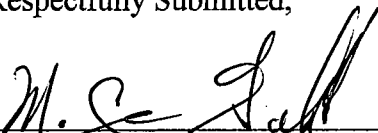
This Court may represent justice or cover-up the illegal acts of Appellee and their attorneys; a violation of 42 USC §§ 1983, 1985 and 1986.

VI. CONCLUSION

Appellee's illegal conduct has caused Appellants irreparable harm for two (2) years and must stop!

WHEREFORE, Appellants pray this Honorable Court grant their motion for reconsideration and order all relief prayed for.

Respectfully Submitted,



M. Eugene Gibbs, [Esq.] Pro-se
4257 Monterey Drive
Florence, SC 29501

January 13, 2016

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)
)
NATIONSTR MORTGAGE, LLC,)
)
Appellee,)
)
vs.)
)
BARBARA A. GIBBS, MELVIN E.)
GIBBS, And WESTBROOK PHASE IV)
HOMEOWNERS' ASSOCIATION)
)
Appellants.)

IN THE COURT OF APPEALS
OF SOUTH CAROLINA

RECEIVED

JAN 19 2016

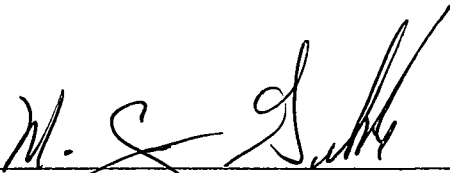
CASE NO: 2015-001873

SC Court of Appeals

CERTIFICATE OF SERVICE

I, Melvin E. Gibbs, hereby certify that a copy of Appellants' Motion for Reconsideration, was placed with USPS Priority Mail, this 13th day of January 2016, to:

Vance L. Brabham, III, Esq.
SCOTT & CORLEY, P.A.
2712 Middleburg Drive
Suite 200
Columbia, SC 29204



M. Eugene Gibbs
4257 Monterey Drive
Florence, SC 29501

Barbara A. Gibbs
4257 Monterey Drive
Florence, SC 29501

N METRO
GA 301
13 JAN '16
PM 3 L



RECEIVED
JAN 19 2016
SC Court of Appeals

Clerk
South Carolina Court of Appeals
1230 State St,
Columbia, SC 29201

29201321130

